

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT WINCHESTER**

BIANCA CLAYBORNE, et al.,)	
)	
Plaintiff,)	
)	Case No.: 4:24-cv-00012
v.)	
)	Judge Clifton L. Corker
RUBEN BASALDUA, et al.,)	
)	JURY DEMANDED
Defendants.)	

DECLARATION OF ANTHONY A. ORLANDI

I, Anthony A. Orlandi, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the statements contained herein are true and correct:

1. On January 23, 2024, Plaintiffs sent a public records request to the County. The County responded on February 1, 2024. A copy of that correspondence is attached as **Exhibit 1** hereto. The County did not produce any records in response to the public records request.

2. On April 22, 2024, Plaintiffs served a First Set of Requests for Production to the County Defendants. On October 11, in response to those RFPs, the County Defendants produced call logs and an audio recording.

3. Attached as **Exhibit 2** hereto is an email string between Plaintiffs' counsel and counsel for the County Defendants.

4. On December 3, Plaintiffs asked the County Defendants if they would oppose naming Sherrill, Sharketti, Bell, and Watkins (the previous "John Does"). That day, the County Defendants responded that they could not take a position without seeing the amended pleading.

5. On December 8, Plaintiffs received the transcripts of the depositions of Bell, Sharketti, Watkins, and Sherrill.

6. On December 11, Plaintiffs deposed Younglove. Excerpts of her deposition are attached as **Exhibit 3** hereto.

7. On January 2, 2025, Plaintiffs received the transcript of the Younglove deposition.

8. On January 3, Plaintiffs sent the proposed First Amended Complaint (“FAC”) to all counsel, asking for a response by January 8 with their positions on leave to amend and if they objected to unsealing it.

9. On January 8, new counsel at the Tennessee Attorney General’s Office contacted Plaintiffs’ counsel to state that they were substituting as counsel for DCS. Plaintiffs spoke with them on January 9 and asked that DCS indicate by January 13 if it objected to unsealing any allegations in the FAC. DCS did not respond by January 13 to raise any objections.

Per 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 30, 2025

/s/ Anthony A. Orlandi

Anthony A. Orlandi